

REMARKS

This is a Reply to the final Office Action of November 26, 2007. Applicant thanks the Examiner for carefully considering the present application, and for allowing claim 20.

Status of Claims

Claims 9-20 are currently pending in the above-captioned patent application.

Claims 9-14, 16, 18 and 19 were rejected under 35 USC 103(a) as being unpatentable over USPN 5,956,487 to Venkatraman et al. ("Venkatraman") in view of USPN 6,148,346 to Hanson ("Hanson"). Claims 15 and 17 were rejected under 35 USC 103(a) as being unpatentable over Venkatraman and Hanson and further in view of USPN 5,938,726 to Reber et al. ("Reber"). Claim 20 has been allowed.

Claim Amendments

By way of this Reply, dependent claim 10 has been amended for clarification purposes. No new matter has been added and none of the amendments is made in view of prior art.

Rejection of Claims 9-14, 16, 18 and 19 under 35 USC §103(a)

Rejection of claims 9-14, 16, 18 and 19 under §103(a) as being unpatentable over Venkatraman in view of Hanson is respectfully traversed because the claims include limitations not taught or suggested by the cited references, whether considered separately or in combination.

The claimed invention is directed to a network and an interface for accessing devices in that network. Independent claim 9 requires, in part: (i) "creating a device link page for access to graphical or textual information in one or more devices;" (ii) "the device link page contains one or more device button each associated with a device currently connected to the network;" and (iii) "associating a hyper-text link with each device button, wherein the hyper-text link provides a link to graphical or textual information contained in the device that is associated with the device button." By contrast, Venkatraman and Hanson, whether considered separately or in combination, fail to show or suggest at least the claimed limitations (i), (ii), and (iii), above.

The instant Office Action has equated an individual home page contained within an individual device as taught by Venkatraman to the claimed “device link page.” Applicant respectfully disagrees. Figure 3 of Venkatraman clearly shows that the page relied upon by the instant Office Action is merely a home page for a printer 10, that is, the web page 18 *contained* in the memory 210 of the printer 10 as more clearly shown in Fig. 1B of Venkatraman. The web page 18 does not link to any other devices, nor does it link to the printer 10 itself because it is already a part of the printer 10. Thus, the web page 18 of Venkatraman is *not* the same as the claimed “device link page.” The instant Office Action (page 5, the bottom two lines) suggests that the device page 18 of Venkatraman can be accessed using a network, i.e., the Internet. However, the instant Office Action has failed to identify which element of the Internet can be equated to the claimed “device link page,” and, even if such an element is identified, the instant Office Action still contradicts itself by equating *both* the identified element of the Internet *and* the device page 18 to the claimed “device link page.” Thus, independent claim 9 should be allowable for at least these reasons. Amended dependent claim 10 further limits the claimed “device link page” to be displayed on a display device a control device separate from the one or more devices. Thus, dependent claim 10 should be allowable for at least this additional reason.

The instant Office Action further equates the “Available Printers” GUI button 62 in Fig. 3 of Hanson to the claimed “device button.” Applicant again respectfully disagrees. Referring to col. 5, lines 37-39 of Hanson, clicking the purported button 62 would bring out a *whole list* of Available Printers as shown in Fig. 5, in contrast to the claimed invention where “each” device button is associated with “a device.” Applicant further respectfully traverses the assertion made in the instant Office Action (page 6, lines 9-10) that in Hanson the user eventually selects a device via a button accordingly. Hanson does not provide such a teaching. If the Examiner has drawn this conclusion based on his personal knowledge, Applicant hereby respectfully requests that an affidavit be provided under 37 CFR 1.104(d)(2). Indeed, Fig. 5 of Hanson clearly shows that the Available Printers button does *not* represent one of a set of printer devices selected by a user as asserted by the Examiner. Rather, the Available Printers button of Hanson merely represents a *list of all* available printers. Hanson does not further teach whether these available printers can be conveniently selected from the interface.

It is further respectfully submitted that the rejection as set forth in the instant Office Action does not appear to read on the claims. For example, in rejecting claim 9, the instant Office Action (page 6, lines 15-16) asserts that Venkatraman discloses a set of user interface functions written in HTML. However, claim 9 of the present application recites “associating a hyper-text link with each device button,” and the instant Office Action has failed to establish that the user interface functions written in HTML as taught by Hanson are equivalent to the claimed “associating a hyper-text link with each device button.” The instant Office Action (page 3, line 17) further asserts that Venkatraman discloses displaying device information on a network browser. However, it is unclear whether the Examiner has intended to equate the network browser of Venkatraman to the claimed “display device,” and the Examiner has not established how the device information as taught by Venkatraman can be equated to the claimed “device link page.” Thus, the rejection is improper and is respectfully traversed.

Regarding claim 13, it is respectfully submitted that Venkatraman and Hanson, whether considered separately or in combination, fail to show or suggest the additional limitation of a device “logical name.” The device names HDE/Meister and HDE/Gerry as taught in Hanson, relied upon by the instant Office Action are not “device logical names” as claimed. Rather, HDE is a company’s name, and Meister and Gerry appear to be persons’ names that are arbitrarily assigned to the printers. Further, the device names as taught in Hanson are merely listed in a list of all available printers, and cannot be converted to “device buttons” as claimed. Thus, the device names in Hanson are not the claimed “device logical names,” and claim 13 is patentable over Venkatraman and Hanson for this additional reason. The references, separately or in combination, do not disclose the claimed limitations.

Regarding claim 14, it is respectfully submitted that the instant Office Action has failed to read in the claim limitation “device ICON image.” Rather, the instant Office Action (page 4, lines 1-7) merely asserts that claims 13 and 14 are rejected together, based on the proposition that Hanson supplies a purported device logical name, and without further clarifying which element as taught by Hanson or Venkatraman would correspond to the claimed “device ICON image” based on which a “device button” can be created. The instant Office Action (page 6,

lines 12-13) further reiterates that the references of record teach a device icon image, a property file, and a logo image, without providing any details. Thus, the rejection of claim 14 is improper and should be withdrawn. Indeed, the references, separately or in combination, do not disclose the claimed limitations.

Regarding claims 16 and 18, it is respectfully submitted that the instant Office Action has failed to read in at least the claim limitation “property file.” The references, separately or in combination, do not disclose the claimed limitations. In response to Applicant’s arguments, the instant Office Action (page 6, lines 12-13) simply reiterates that the references of record teach a device icon image, a property file, and a logo image, without providing any details. Thus, the rejection of claims 16 and 18 is improper and should be withdrawn.

Regarding claim 19, it is respectfully submitted that contrary to the assertions in the instant Office Action, none of the device names (HDE/Meister, HDE/Gerry) in Hanson corresponds to any one of the purported device buttons in Figs. 3-5 (relied upon by the instant Office Action). Rather, clicking the “Printer Status 61” in Fig. 3 of Hanson would lead to “the connected printer’s current status” (*see, e.g.*, col. 5, lines 34-35 of Hanson). That is, the top menu 60 as shown in Fig. 3 of Hanson is directed to a *single preconnected* printer (*see, e.g.*, col. 5, lines 25-26 of Hanson). Further, as discussed, the Available Printers button 62 in Fig. 3 is not equivalent to the claimed “device button” either, as the Available Printers 62 of Hanson corresponds to a *list of all* printers. In addition, it is respectfully submitted that the instant Office Action has failed to read in limitations such as “detecting whether a device is connected to the home network,” and “associating a logical device name with the home device,” rendering the rejection also improper. The references, separately or in combination, do not disclose the claimed limitations.

It is further respectfully submitted that there is no reason, motivation or suggestion for those of ordinary skill in the art to combine Venkatraman and Hanson. As discussed above, Hanson teaches a *preferred* office device (printer) *preconnected* to the control device, and that the preferred printer may be substituted by other available, equivalent printers. Hanson merely

provides a list of printers, without providing any means for selecting these printers. Thus, Hanson teaches away from the claimed invention as an object of the claimed invention is controlling diverse home devices.

In view of the above, Venkatraman and Hanson, whether considered separately or in combination, fail to show or suggest the claimed invention as recited in independent claim 9 of the present application. In addition, there is no reason, motivation or suggestion to combine Venkatraman and Hanson. Thus, claim 9 of the present application is patentable over Venkatraman and Hanson for at least the reasons set forth above. Dependent claims 10-14, 16, 18 and 19 are allowable for at least the same reasons, and for at least the additional reasons discussed above. Accordingly, withdrawal of the rejection of claims 9-14, 16, 18 and 19 is respectfully requested.

Rejection of Claims 15 and 17 under 35 USC §103(a)

Rejection of claims 15 and 17 under §103(a) as being unpatentable over Venkatraman and Hanson in view of Reber is respectfully traversed because the claims include limitations not taught or suggested by the cited references, whether considered separately or in any combination.

As discussed above with respect to independent claim 9, Venkatraman and Hanson, separately or in combination, fail to show or suggest at least the above-mentioned limitations (i), (ii) and (iii), which are also required by dependent claims 15 and 17. Reber, as in Venkatraman and Hanson discussed above, also fails to show or suggest at least the limitations (i), (ii) and (iii) of the claimed invention, and fails to supply that which Venkatraman and Hanson lack. More specifically, Reber is silent with respect to at least the claimed “device link page.”

In addition, with respect to the claimed limitation of “creating a manufacturer device button based on the device LOGO image” (claims 15 and 17), it is respectfully submitted that Reber merely discloses an advertisement LoGo, and does not disclose the claimed limitations. As clearly shown in Fig. 3 of Reber, the LoGo 53 is merely an advertisement image displayed on a webpage, and is not clickable and thus has nothing to do with the claimed “device button.”

Thus, Reber, Venkatraman and Hanson also fail to show or suggest the additional limitations of claims 15 and 17.

Further, as discussed above, Hanson teaches away from the claimed limitation. Thus, there is no reason, motivation or suggestion for those of ordinary skill in the art to combine Reber, Venkatraman and Hanson.

Furthermore, it is respectfully submitted that relying on the LoGo 53 of Reber without its context to reject the claimed “device button based on the device LOGO image” is an indication that the Examiner, aided by the present application, has used impermissible hindsight reconstruction in picking and choosing the references to arrive at the claimed limitation.

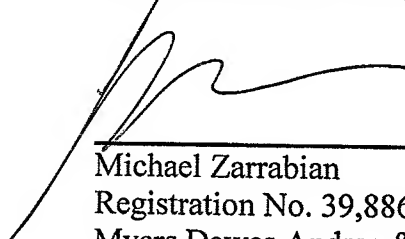
In view of the above, Reber, Venkatraman and Hanson, whether considered separately or in any combination, fail to show or suggest the claimed invention as recited in claims 15 and 17 of the present application. Further, there is no reason, motivation or suggestion to combine Reber, Venkatraman and Hanson. In addition, the combination of the cited references is improper as the Examiner appears to have relied upon impermissible hindsight reconstruction. Thus, claims 15 and 17 are patentable over Reber, Venkatraman and Hanson for at least the reasons set forth above. Accordingly, withdrawal of the rejection of claims 15 and 17 is respectfully requested.

CONCLUSION

In view of the foregoing amendments and remarks, Applicant respectfully requests that the rejections of the claims be withdrawn, and that the case be passed to issue. If the Examiner feels that a telephone interview would be helpful to the further prosecution of this case, it is respectfully requested that the undersigned attorney be contacted at the listed telephone number.

Please direct all correspondence to **Myers, Dawes Andras & Sherman, LLP**, 19900 MacArthur Blvd., 11th Floor, Irvine, California 92612.

Respectfully submitted,



2/25/08

Michael Zarrabian (Date)
Registration No. 39,886
Myers Dawes Andras & Sherman, LLP
19900 MacArthur Blvd., 11th Floor
Irvine, CA 92612
(949) 223-9600
(949) 223-9610 – Fax
Customer No.: 23386